

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Deangelo Thomas

Case: 2:24-mj-30437

Assigned To : Unassigned

Assign. Date : 10/10/2024

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 15, 2024 in the county of Wayne in the
Eastern District of District, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922 (g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 10, 2024City and state: Detroit, MI*Complainant's signature*

Sherri Reynolds, Special Agent, ATF

Printed name and title*Judge's signature*

Hon. David R. Grand, Unisted States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT

I, Sherri Reynolds being duly sworn, hereby state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since December of 2009. I am currently assigned to the Detroit Field Division. I completed twenty-six weeks of training in the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving illegal firearms possession, and firearms trafficking.

Throughout my career, I have investigated or have been involved in hundreds of investigations that involve individuals who are felons in possession of firearms.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, police officers, informants, and witnesses. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all facts known to law enforcement related to this investigation.

3. This affidavit is made in support of a criminal complaint charging Deangelo THOMAS, a convicted felon—with possession of a firearm, on or about on July 15, 2024, in violation of Title 18 U.S.C § 922(g)(1).

II. SUMMARY OF THE INVESTIGATION

4. On August 8, 2024, ATF executed a state search warrant at the residence of THOMAS, city of Macomb, Eastern District of Michigan. The Macomb residence is the address THOMAS reported as his parole address to the Michigan Department of Corrections (MDOC). During the search warrant, law enforcement seized a cellular telephone with the assigned telephone number xxx-xxx-1984. THOMAS reported this number to MDOC as his primary telephone number. A state search warrant was obtained to forensically examine the cellular phone associated with the xxx-xxx-1984 number.

5. During a manual review of the cellular telephone, law enforcement located a video that was recorded on July 15, 2024. The video showed THOMAS in possession of two firearms. In the video, THOMAS offered to sell the firearms for “seven fifty” to someone identified as “Nephew”. ATF then obtained a search warrant for THOMAS’ Apple iCloud account and during the review of the Apple iCloud account, the same video was located. During a further review of the video on the Apple iCloud account, THOMAS was identified by his tattoos and voice

while he possessed the two firearms in his lap. The two firearms from the video are depicted in Image One below.

Image One



6. In the video, THOMAS picked up each firearm and moved them, revealing the serial numbers of both firearms to the camera, at separate times. See Image Two below. One firearm is a Taurus, model G2C, 9mm caliber pistol bearing the serial number xxxxx6685. The second firearm is a Taurus, model G2S, 9mm caliber pistol bearing the serial number xxxxx428. The metadata on the digital recording revealed that the video was recorded in Detroit, Eastern District of Michigan.

Image Two



7. In the video, THOMAS appeared to be seated inside a Toyota Sports Utility Vehicle (SUV). During the search warrant, a Toyota Highlander SUV was parked in the driveway of the residence. Additionally, according to THOMAS's wife, the Toyota Highlander was exclusively driven by THOMAS.

8. A query of both Taurus firearms showed one was reported stolen out of Auburn Hills, Michigan, on August 7, 2023. The other was reported stolen out of Detroit on July 7, 2024.

9. On September 26, 2024, ATF Special Agent Kara Klupacs, who is an Interstate Nexus Expert, indicated that both of the Taurus firearms were manufactured outside of Michigan and therefore have affected interstate nexus.

10. A review of THOMAS's criminal history showed that THOMAS has the following felony convictions out of the Third Judicial Circuit Court, Wayne County, from several September 29, 2004, convictions (this is not a complete list of his criminal history):

- a. Assault with Intent to Commit Murder;
- b. Felony Weapons;
- c. Possession or Sale of Weapons-Taser;
- d. Carrying a Weapon with Unlawful Intent;
- e. Discharge of a Weapon/Firearm From a Vehicle;
- f. Firearm, Discharge Towards a Building;
- g. Carrying a Concealed Weapon; and
- h. Attempted Controlled Substance Delivery-Manufacturing Marijuana.


11. THOMAS spent over seventeen years in prison for aforementioned convictions. At the time THOMAS possessed the firearms, probable cause existed that he knew he was a felon and/or convicted of a crime punishable by more than one year.

12. At the time THOMAS possessed the firearms, he was on parole with the MDOC.

III. CONCLUSION


13. Probable cause exists that Deangelo THOMAS, a convicted felon, possessed two firearms on July 15, 2024, in violation of Title 18 U.S.C § 922(g)(1).

Respectfully Submitted,



Sherri Reynolds
ATF Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Date: October 10, 2024